

JP:NR

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-11-413

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -
CRYSTAL GUZMAN and
ZULEIKA LOPEZ HOLGUIN,

(21 U.S.C. § 846)

Defendants.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

NOAH ABBOTT, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about and between April 17, 2011 and April 19, 2011, within the Eastern District of New York and elsewhere, defendants CRYSTAL GUZMAN and ZULEIKA LOPEZ HOLGUIN, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a substance containing heroin, a Schedule I controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

(Title 21, United States Code, Section 846).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about April 17, 2011, CRYSTAL GUZMAN and ZULEIKA LOPEZ HOLGUIN arrived at Orlando International Airport in Orlando, Florida, aboard Jet Blue flight B6 1710 from Cancun, Mexico.

2. Defendant CRYSTAL GUZMAN was selected for a Customs and Border Protection ("CBP") examination. During an interview with CPB agents, she admitted to having inserted 19 pellets of narcotics in her rectal cavity.

3. CRYSTAL GUZMAN was subsequently taken to the Orange Regional Medical Center by CPB and Immigration and Customs Enforcement ("ICE") agents. She expelled 19 pellets, the contents of which were field tested and resulted positive for heroin.

4. The total approximate gross weight of the heroin found in the pellets expelled by CRYSTAL GUZMAN is 283.4 grams.

5. Defendant ZULEIKA LOPEZ HOLGUIN was also selected for a CBP examination. During an interview with CPB agents, she admitted to having inserted narcotics into her vagina.

6. ZULEIKA LOPEZ HOLGUIN was subsequently taken to the Orange Regional Medical Center by CPB and ICE agents. A packet was removed from her vagina. The contents of that package

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

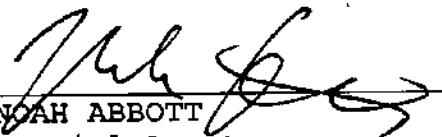
were field tested and resulted positive for heroin.

7. The total approximate gross weight of the heroin found in the packet removed from ZULEIKA LOPEZ HOLGUIN is 210.0 grams.

8. Subsequent to arrest, CRYSTAL GUZMAN and ZULEIKA LOPEZ HOLGUIN were advised of their rights and agreed to cooperate with law enforcement officials. Prior to their arrests, the defendants had been scheduled to fly to John F. Kennedy Airport ("J.F.K. Airport") to deliver the narcotics they were carrying. The defendants agreed to complete their travel to New York on April 18, 2011 and to attempt a controlled delivery of the narcotics.

9. The defendants flew to J.F.K. Airport on April 18, 2011, accompanied by two ICE agents. However, attempts to arrange the delivery of the narcotics were unsuccessful.

WHEREFORE, your deponent respectfully requests that
defendants CRYSTAL GUZMAN and ZULEIKA LOPEZ HOLGUIN be dealt with
according to law.


NOAH ABBOTT
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
19th/day of April, 2011

THE HONORABLE VIKTOR V. POHORELSKY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK